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Attorneys for Defendant: Otto Trucking LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**NOTICE OF ERRATA REGARDING
DEFENDANTS' OPPOSITION TO
WAYMO'S MOTION FOR PARTIAL
SUMMARY JUDGMENT**

Courtroom: 8 - 19th Floor
Judge: Hon. William Alsup

1 TO: THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE THAT Otto Trucking provides this notice of errata to correct a
3 statement in Defendants' Opposition to Waymo's Motion for Partial Summary Judgment (Dkts.
4 1524-3, 1524-4, and 1525) and the supporting Declaration of Hong-An Vu (Dkts. 1524-5 and
5 1525-1).

6 Page 9, lines 18-19 of Defendants' Opposition to Waymo's Motion for Partial Summary
7 Judgment states, "Waymo also did not include Mr. Zbrozek, Mr. Vines, or Mr. Gorman as
8 custodians and did not collect or produce their documents."

9 This sentence should be corrected to state, "Waymo also did not include Mr. Vines, Mr.
10 Zbrozek, or Mr. Gorman as custodians for applying agreed-to search terms and did not collect or
11 produce Mr. Gorman's or Mr. Vines' documents."

12 Similarly, paragraph 30, line 14-16 of the Declaration of Hong-An Vu states, "Sasha
13 Zbrozek, Nick Vines, and Tom Gorman are not custodians whose documents Waymo search and I
14 am not aware if they were ever discussed as custodians as none of these individuals appears on
15 Waymo's initial disclosures."

16 This sentence is replaced with "Nick Vines and Tom Gorman are not custodians and I am
17 not aware if they were ever discussed as custodians as neither appears on Waymo's initial
18 disclosures."

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1 Dated: September 14, 2017

Respectfully submitted,

2 By: /s/ Hong-An Vu

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **September 14, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **September 14, 2017**.

/s/ Hong-An Vu
HONG-AN VU